

Federal Communications Commission
Office of the Secretary
Washington, D.C. 20554

Re: In the Matter of RM-10352

As a long time user of the Amateur Radio Service 160 meter (1.8 MHz) band, I would like to express my strongest support for the Briggs-Tippett petition (RM-10352). This petition is very similar to petitions filed by Thomas J. Rauch and Joseph T. Subich shortly after LORAN operation in the band ended in the late 1970s.

The amateur radio service has long recognized the need for the protection of narrow bandwidth modes from interference caused by wide bandwidth modes. On each amateur frequency assignment (band) in the high frequency (3 to 30 MHz) spectrum between 11 and 50% of available bandwidth (27% of all amateur spectrum between 3 and 30 MHz) is reserved for narrow band modes. Applied to the 160 meter band, this average represents the requirement for 54 KHz (1.800 to 1.854 MHz) of narrow bandwidth allocation.

The lack of a protected allocation for narrow bandwidth modes on the 160 meter band is simply a historical accident. When the 160 meter band was returned to amateur use following World War II, it was accompanied by severe limitations designed to protect LORAN operations. Those limitations included segmenting the band into eight 25 KHz "chunks" with power restrictions based on location, time of day, and proximity to LORAN facilities. This segmentation, and the relatively sparse usage due to interference from LORAN, made allocation of very small narrow bandwidth segments impractical. However, the removal of the LORAN restrictions about 1980 and increased usage of the band have created the same conditions that called for bandwidth segmentation of high frequency amateur allocations.

The American Radio Relay League, Inc. (ARRL) and its members have recognized the need for separation by establishing a "voluntary bandplan" for 160 meters but that bandplan is only a first step. By putting the force of regulation behind that bandplan as the instant petition seeks, the Commission would reduce its involvement and the resources used for 160-meters by reducing disputes and conflicts between operators. Just as there is no question of operating with wide bandwidth modes in the narrow bandwidth allocations on the other high frequency bands, the proposed regulations would draw a bright line on 160 meters.

Absent explicit regulatory impact, voluntary band planning see appears to work only where the number of individuals involved in the establishing the band plan is a significant portion of the total possible users of the band and there are

significant barriers (either technical or regulatory) to operation on the effected bands. With most commercially available amateur equipment including 160 meter capability and every General class or higher licensee holding privileges on the band there are no significant barriers to entry regarding 160 meters.

This division of narrow bandwidth and wide bandwidth modes serves the basis and purpose of amateur radio by providing relatively interference free spectrum for experimentation with new modes, including digital modes, and providing an opportunity to preserve legacy modes, primarily "CW" or telegraphy.

Although I would personally prefer that the Commission establish the ratio of spectrum for narrow band and wide band modes more consistent with the HF average (see above) or the division on the next closest amateur allocation (the 3.5 – 4.0 MHz band is 50% narrow bandwidth), the Briggs-Tippett petition is consistent with the voluntary bandplan published by the ARRL. As such, this represents a reasonable proposal based on broad based input and much user consultation.

Adopting the key holding of the ARRL bandplan and including it in regulation as proposed by Briggs and Tippett is a win-win for all concerned. It reduces the resources that the Commission may have to expend in the area, it protects narrow bandwidth operations and their ability to serve the basis and purpose of the amateur radio service, and it provides a regulatory underpinning for the results of voluntary spectrum planning efforts. Finally, only action by the Commission can help the amateur users of 160 meters achieve (through regulation) the one thing that a voluntary bandplan cannot achieve, a true separation of narrowband and wideband modes on 160 meters.

I urge the Commission to adopt and implement the Briggs-Tippett proposal at the earliest possible moment.